## Case 1:20-cv-00548-EK-JRC Document 20 Filed 07/30/20 Page 1 of 1 PageID #: 77



Joey Tsai 535 5th Avenue Fourth Floor New York, NY 10017 T. 646.829.9001 F. 646.829.9002 jtsai@tsaipllc.com www.tsaipllc.com Admitted to practice law in New York and New Jersey

July 29, 2020

## **VIA ECF**

Hon. Lois Bloom United States Magistrate Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: Bedoya v. NYC Citrus LLC, et al. (20-cv-548)(EK)(LB)
Request to Extend Mediation Schedule

Dear Judge Bloom,

We represent Defendants in the above-referenced matter. The Parties jointly submit this request to extend the current mediation schedule. As per the Court's order on May 29, 2020, your Honor ordered the following: 1) July 13, 2020 – document exchange between Parties; 2) July 31, 2020 – meet and confer between Parties; and 3) August 7, 2020 – file joint status report. (See Docket No. 17). The Parties request the above schedule be extended as follows: 1) September 7, 2020 – document exchange between Parties; 2) September 14, 2020 – meet and confer between Parties; and 3) September 21, 2020 – file joint status report. This is the first request for an extension.

The Parties request an extension to allow for more time for the Parties to obtain records and engage in settlement discussions. Defendants operate out of a facility that only recently reopened to the extent where records can be obtained. Prior to this, due to COVID-19 restrictions, Defendants were unable to gather records at the facility. The above requested extension will allow the Parties to obtain records and engage in settlement discussions.

The Parties respectfully requests the Court to extend the deadlines as proposed above. We thank the Court for its time and attention.

July 30, 2020

HON. LOIS BLOOM
United States Magistrate Judge

Enclosure

cc: Amit Kumar, Esq. (VIA ECF)

Respectfully submitted,
/s/ Joey Tsai
Joey Tsai
Attorney for Defendants